


- a. Offering products, goods, or services for sale through the Shopify platform.
- b. Making misrepresentations to Shopify concerning intellectual property rights, including but not limited to misrepresentations concerning the existence or status of any intellectual property litigation filed against other Shopify merchants.

c. Submitting false court documents to Shopify purporting to arise from litigation filed against other Shopify merchants.

The Parties therefore respectfully request that the Court enter the Proposed Judgment and Permanent Injunction attached hereto.

Dated: 7-8-24.


~~THE HONORABLE LAWRENCE J. VILARDO~~
UNITED STATES DISTRICT JUDGE
John L. Sinatra, Jr